

# EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

JASON COLEMAN and JESSICA CASEY,  
on behalf of the RVNB Holdings, Inc.  
Employee Stock Ownership Plan, and on  
behalf of a class of all other persons similarly  
situated,

Plaintiffs,

v.

NEIL M. BROZEN, ROBERT PETERSON,  
JR., VASILIA PETERSON, MIKE PAXTON,  
NICK BOURAS, STERLING INVESTMENT  
PARTNERS III, L.P., NICOLE PETERSON  
2012 IRREVOCABLE TRUST, and BROOKE  
PETERSON 2012 IRREVOCABLE TRUST,

Defendants.

Case No. 3:20-cv-01358-E

**DECLARATION OF JOHN S. EDWARDS, JR.  
ON BEHALF OF AJAMIE LLP IN SUPPORT OF  
APPLICATION FOR AWARD OF ATTORNEYS' FEES AND EXPENSES**

I, John S. Edwards, Jr., declare as follows:

1. I am a partner in the law firm of Ajamie LLP. I am submitting this declaration in support of my firm's application for an award of attorneys' fees and expenses related to services rendered in the above-entitled action (the "Action"). Unless otherwise stated, I have personal knowledge of the facts set forth herein and, if called upon, could and would testify thereto.

2. This firm is counsel of record for Plaintiffs and Class Representatives Jason Coleman and Jessica Casey and is Class Counsel for the Settlement Class. *See* ECF No. 143.

3. The information in this declaration regarding the firm's time and expenses is taken from time and expense printouts and supporting documentation prepared and/or maintained by the firm in the ordinary course of business. These reports (and backup documentation where necessary) were reviewed in connection with the preparation of this declaration. The purpose of

this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. As a result of this review, reductions were made to both time and expenses in the exercise of billing judgment. As a result of this review and the adjustments made, I believe that the time reflected in the firm's lodestar calculation and the expenses for which payment is sought as stated in this declaration are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the Action. I also believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

4. After the reductions referred to above, the number of hours spent on this Action by my firm is 199.7 A breakdown of the lodestar is provided in Exhibit A. The lodestar amount for attorney/paraprofessional time based on the firm's current rates is \$142,230. The hourly rates in Exhibit A are the usual and customary rates set by the firm for each individual.

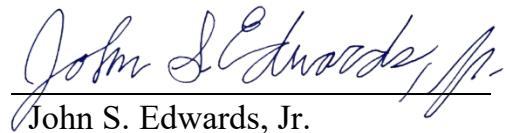
5. These hourly rates are also, in my experience, reasonable for this type of work in Texas federal courts, including in the Eastern District of Texas. *See, e.g., In re Apache Sec. Lit.*, No. 4:21-cv-00575 (S.D. Tex.), ECF No. 165 (Lead Counsel's Motion for an Award of Attorneys' Fees & Litigation Expenses, dated Aug. 15, 2024), No. 166-6 (Declaration of Mr. Edwards, dated Aug. 2, 2024), and ECF No. 178 (Opinion & Order, dated Nov. 25, 2024); *Casey v. Reliance Trust Co.*, Case No. 4:18-cv-000424-ALM (E.D. Tex.), ECF No. 165 (Plaintiffs' Motion for Award of Attorneys' Fees & Costs, dated June 23, 2020) and No. 175 (Order Awarding Attorneys' Fees & Costs, dated Aug. 6, 2020); *In re Cobalt Int'l Energy, Inc. Sec. Lit.*, No. 4:14-cv-3428 (S.D. Tex.), ECF No. 359-12 (Declaration of Mr. Ajamie, dated Jan. 8, 2019) and No. 366 (Order Awarding Attorneys' Fees & Payment of Litigation Expenses, dated Feb. 13, 2019).

6. My firm seeks an award of \$490.38 in expenses related to the prosecution of the litigation. Those expenses are summarized in Exhibit B.

7. The expenses incurred by Ajamie LLP in the Action are reflected in the books and records of my firm. These books and records are prepared from expense vouchers, check records, and other source materials and are an accurate record of the expenses incurred. I believe these expenses were reasonable and necessary and expended for the benefit of the Settlement Class in the Action.

8. The resume of my firm and its lawyers is attached as Exhibit C.

I declare, under penalty of perjury, that the foregoing facts are true and correct. Executed on June 4, 2025.



John S. Edwards, Jr.  
John S. Edwards, Jr.

# **EXHIBIT A**

## **Professional Time**

**EXHIBIT A**

***Jason Coleman and Jessica Casey v. Neil M. Brozen et al.***  
**Ajamie LLP**  
**Inception through July 15, 2024**

<b>NAME</b>	<b>POSITION</b>	<b>HOURS</b>	<b>RATE</b>	<b>LODESTAR</b>
John S. "Jack" Edwards, Jr.	Partner	170.2	\$775	\$131,905
Tom Neumayr	Paralegal	22.8	\$350	\$7,980
Whitney Harrelson	Paralegal	6.7	\$350	\$2,345
	<b><i>TOTAL</i></b>	<b><i>199.7</i></b>		<b><i>\$142,230</i></b>

# **EXHIBIT B**

## **Expenses**

**EXHIBIT B**

***Jason Coleman and Jessica Casey v. Neil M. Brozen et al.***  
**Ajamie LLP**  
**Inception through July 15, 2024**

<b><i>CATEGORY</i></b>	<b><i>AMOUNT</i></b>
Filing and Other Fees	\$400.00
Photocopies	\$35.80
Online Legal Research	\$44.58
<b><i>TOTAL</i></b>	<b><i>\$490.38</i></b>

# **EXHIBIT C**

## **Ajamie LLP Firm Resume**

HOUSTON  
Pennzoil Place – South Tower  
711 Louisiana, Suite 2150  
Houston, Texas 77002

NEW YORK  
110 East 59<sup>th</sup> Street, Suite 2200  
New York, New York 10022

713 860 1600 telephone  
713 860 1699 facsimile  
[www.ajamie.com](http://www.ajamie.com)

### About Ajamie LLP

Ajamie LLP is a leading international litigation boutique with offices in Houston and New York. We have won over \$1 billion in awards and settlements, making us one of the elite law firms to achieve such success. Our cross-border work spans more than 20 U.S. states and jurisdictions across Latin America, Europe, and Asia, reflecting our global capabilities and multilingual team. We have initiated worldwide movements, set world records, and have been at the forefront of significant issues.

Our firm handles complex litigation matters, including financial disputes, business litigation, ERISA class actions, securities class actions, securities arbitrations, and international litigation and arbitration. We are known for providing blue-chip defense for companies of all sizes and cross-border representation in intricate business litigation matters. We are lean and efficient, with the expertise and resources to represent clients worldwide. Thomas Ajamie, our Managing Partner, holds the distinction of winning some of the largest awards in United States history.

Recognized by *Chambers USA*, *Benchmark Litigation*, *Best Lawyers*, and other legal industry guides and directories, our lawyers regularly contribute to legal treatises and publications, including the preeminent legal treatise on all aspects of federal law and procedure, *BUSINESS AND COMMERCIAL LITIGATION IN FEDERAL COURTS*, as well as *Chambers and Partners Global Practice Guide*, and *Chambers and Partners USA Practice Guide*.

### Representative Matters: Securities / Finance / Business

- Co-lead counsel recovering a \$79 million settlement in an ERISA class action against Wells Fargo on behalf of its former financial advisors who were wrongfully forced to forfeit their deferred compensation when they left the company. Judge Joseph F. Anderson Jr. stated in his order approving the settlement that "class counsel displayed extraordinary skill and determination throughout this litigation which fully supports their well-known reputation and clear ability to handle a case of this magnitude" and further noted that this is the largest deferred executive compensation recovery in United States history.
- Winning a \$429.5 million securities arbitration award, the largest in history, against a former PaineWebber broker. The Wall Street Journal noted at the time that the size of the award was "roughly 10 times that of the next largest award." The United States Attorney's office criminally prosecuted one of the PaineWebber brokers involved in the fraud. That

broker had worked in PaineWebber's New York headquarters office. The broker was sentenced to six and a half years in federal prison.

- Secured a \$134 million settlement against AT&T—a \$200 billion company represented by top-tier firms—in a partnership dispute over the forced buyout of minority interests in eleven cellular partnerships, concluding a 12-year legal battle.
- Winning a record \$112 million jury award on a civil RICO Act claim on behalf of our Fortune 100 client against defendants who conspired to extort money from our client and tamper with trial witnesses. The jury's verdict was the largest RICO verdict in Texas history, and the third largest in the history of the United States.
- Legal counsel to the Super Bowl LI Houston Host Committee providing a wide range of legal services for this multi-billion-dollar event, including preventive litigation counseling, risk management, contract negotiation and liability prevention advice for the tens of thousands of workers and volunteers involved in events leading up to and including the big game.
- Winning a seven-figure settlement against Wells Fargo in a case where some of its employees secretly diverted money from client accounts in Beverly Hills over two and one-half years. One of the Wells Fargo advisors was sentenced to 24 months in federal prison for his role in the fraud. The case was featured on the front page of the New York Times.
- Part of the legal team recovering over \$173.8 million for investors in the Cobalt International Energy, Inc. securities class action litigation. Our clients alleged that the defendants violated the federal securities laws by, among other things, misstating and concealing facts on Cobalt's partnership with Angolan government officials and the productivity of Cobalt's Angolan oil and gas wells. United States District Court Judge Nancy Atlas lauded the lawyers' work when she said, "Plaintiffs' counsel conducted the litigation and achieved the settlements with skill, perseverance and diligent advocacy."
- Representing a minority investor in a multimillion-dollar lawsuit against majority investors in a joint venture that produces and sells the small batch, luxury sipping tequila Casa Dragones. The majority investors in the company sold a controlling interest to a new investment firm, "dragging along" our client's shares to the new controlling shareholder. Our firm filed suit in Delaware Chancery Court proving that the majority investors had wrongfully and improperly interpreted and asserted the drag-along provision, as well as other provisions of the Shareholders Agreement, and the attempted exercise of such drag-along provision was void and unenforceable.
- Successfully recovering tens of millions of dollars for our clients defrauded by an Arizona investment advisor turned con artist. Working closely with the United States Attorney, FBI and IRS in their prosecution of the fraudster advisor, he was tried and convicted, and is now serving an eight-year sentence in federal prison.

- Winning a \$14.5 million arbitration award on behalf of a New York family against Prudential Equity Group over the course of 84 hearing sessions occurring at the New York Stock Exchange. According to The Wall Street Journal, the award was the third largest award at the time to be handed out by an arbitration panel at the NYSE.
- Winning dismissal for our client, a director of the defendant company, of a securities fraud class action, and settled the action on behalf of a second director without liability for the director.
- Winning the dismissal for lack of personal jurisdiction of patent-infringement claims brought against a Finnish company in Texas federal court.
- Co-counsel in BP ERISA Litigation, alleging that company stock was an imprudent investment for employee retirement plan.
- Co-counsel in an ERISA class action alleging that plan fiduciaries breached their duties of loyalty and prudence by selecting and maintaining inappropriate Putnum mutual funds for the defendant company's 401(k) plan.
- Member of the legal team recovering a \$70 million settlement from Securities America, Inc., the broker-dealer subsidiary of Ameriprise Financial, Inc., for investors who lost money in the Medical Capital Ponzi scheme.
- Settling a lawsuit against two insurance agents, six insurance companies and a law firm for \$7.29 million after four days of trial in Galveston state court. The lawsuit alleged that the defendants negligently advised a 90-year-old widow and her 65-year-old son to sell their Berkshire Hathaway, Inc. stock and use the proceeds to purchase life insurance and annuities as part of an "estate tax plan."
- Negotiating a seven-figure settlement against a national stock brokerage firm for a married couple in Philadelphia whose life savings was lost when a broker churned their account and used their savings to buy speculative technology and internet stocks. We also made claims against the brokerage firm for failing to properly supervise its brokers and failing to notify the customers about the inappropriate handling of their account.
- Negotiating the global resolution of 40 civil proceedings in federal and state court in the United States, in federal and state courts in Mexico, and in civil arbitration proceedings before CANACO in Mexico.
- Winning the dismissal of 21 consolidated class action lawsuits filed in federal court against former officers of a NYSE-listed client alleging violations of Sections 10(b) and 20(a) of the Securities Exchange Act of 1934, and Rule 10b-5 thereunder.
- Winning an eight-figure settlement on behalf of several investors defrauded of over \$100 million by one of the United States' largest national brokerage firms.

- Successfully representing a pension fund in a lawsuit against a New York hedge fund after the hedge fund lost 30% of the funds with which it was entrusted.
- In the Enron litigation, representing one of the insurance companies that provided directors and officers insurance coverage.
- Winning a \$12.2 million judgment, including full damages and all attorneys' fees, on behalf of a multinational computer technology company against its former employees who conspired to engage in a false-invoice and bid-rigging scheme to defraud the company.
- Successfully litigating and settling for seven figures an unliquidated and unsecured general creditor litigation claim in the New York Lehman Brothers bankruptcy proceeding.
- Winning the dismissal of a complaint filed in New Jersey by Prime Healthcare, Inc. against our client who operates hospitals in New Jersey. The complaint asserted antitrust and common law claims and alleged that our client had conspired with others to prevent the plaintiff from competing in New Jersey.
- Negotiating and drafting a structured multimillion-dollar Mexico/USA cross-border settlement resolving over 40 civil actions including federal and state court proceedings in the United States, federal and state court proceedings in Mexico, and civil arbitration proceedings in Mexico.
- Recovering a multi-million dollar “clawback” for a Fortune 100 client in a case where the client’s executive employees were hired away by a competitor. The departing executives had signed agreements in which they promised to pay back restricted stock and stock option awards that they received if they went to work for a competitor.
- Successfully defending our client, a major automobile parts manufacturer, in a consumer class action seeking hundreds of millions of dollars for costs of defective parts used in Ford vehicles.
- Representing an Illinois-based utility company in litigation against distressed bondholders seeking recovery following an \$80 million bond default for an electric power facility located outside of Chicago. This was the “eighth largest municipal bond default in the history of the municipal market,” according to the Bond Investors Association.
- Winning a dismissal of all claims against a major utility company in an antitrust lawsuit alleging conspiracy to monopolize, tying, and a group boycott involving an interstate gas pipeline system.
- Litigating the existence of an agreement to affiliate our client’s television stations with the WB Television Network. We secured a favorable settlement in the context of the sale of our client’s Houston station for \$95 million, an “incredibly high” price according to Variety, including payment of all our attorneys’ fees.

- Defending a major pharmaceutical company in a \$68 million lawsuit claiming breach of contract, fraud, tortious interference, misappropriation of confidential information, and conspiracy to convert patent rights in connection with the company's alleged failure to invest in an agricultural equipment enterprise.
- Representing an excess carrier in primary and subrogation litigation, and recovered millions of dollars for our carrier client.
- Successfully defended the second largest funeral and cemetery services company against a \$4 billion hostile takeover bid by SCI, that industry's largest company. The case involved securities, tort and antitrust litigation.
- Representing physicians in actions against multiple health insurers for their fraudulent reimbursement practices.
- Representing an automotive parts supplier in a lawsuit against a major automobile manufacturer for misrepresentation and breach of contract, and negotiating a business resolution of the parties' dispute.

## Our Lawyers

### Thomas R. Ajamie

#### Managing Partner

Mr. Ajamie is an internationally recognized trial lawyer who has successfully represented clients in complex commercial litigation and arbitration. The authoritative *Chambers USA* has described Mr. Ajamie as "relentless, energetic and intelligent" and a "hard-working and successful trial lawyer who never quits." He has handled a number of high-profile cases, including groundbreaking securities and financial cases, cross-border litigation, business contract disputes and employment issues. Mr. Ajamie has won two of the largest awards ever handed down by an arbitration panel for investors, including a \$429.5 million award. He has also won a record \$112 million civil RICO jury verdict. Mr. Ajamie has been recognized by numerous legal publications and directories, including *Chambers USA*, *Best Lawyers in America*, Euromoney's *Benchmark Litigation*, and *Super Lawyers*, and is rated AV-Preeminent by Martindale-Hubbell. *The National Law Journal* has named Mr. Ajamie one of its 50 Litigation Trailblazers. He was also honored as one of the nation's 500 Leading Lawyers by *Lawdragon*, as well as that publication's "100 Lawyers You Need to Know in Securities Litigation." Mr. Ajamie is regularly invited to give legal analysis by news media outlets including ABC, CNN, CNBC, NPR and BBC, and his work has been featured in publications such as *The Wall Street Journal*, *The New York Times* and *The American Lawyer*. He is the co-author of the book *FINANCIAL SERIAL KILLERS: INSIDE THE WORLD OF WALL STREET MONEY HUSTLERS, SWINDLERS, AND CON MEN*. Mr. Ajamie received his law degree from the University of Notre Dame Law School. He is licensed to practice law in Texas and New York, and is admitted to the United States District Courts for the Northern, Southern, Eastern and Western Districts of Texas, the District of Colorado, the United States Bankruptcy Court for the Southern District of New York, and the Fifth Circuit of the U.S. Court of Appeals.

**Eric P. Chenoweth**  
**Partner**

Eric Chenoweth is a highly accomplished trial attorney known for his legal expertise and dedication to his clients. He has established himself as a trusted advocate in complex commercial litigation, arbitration, and intellectual property matters. Mr. Chenoweth has successfully represented clients in high-stakes disputes involving intellectual property, breach of contract, and business torts across industries such as construction, petrochemical, and oilfield services. Notably, he won a \$32.5 million trial verdict for a hospital following a property insurance dispute, which was ranked among the top national verdicts of that year. Recognized by *Super Lawyers*, Mr. Chenoweth is a contributor to *Chambers and Partners USA Practice Guide*. He earned his undergraduate degree from Syracuse University, where he was an Academic All-American and Football Team Captain. He obtained his law degree from the University of Virginia School of Law. Mr. Chenoweth is licensed to practice law in Texas and is admitted to the Northern, Southern, Eastern, and Western Districts of Texas, the Southern District of Texas Bankruptcy Court, and the United States Patent and Trademark Office.

**John S. “Jack” Edwards, Jr.**  
**Partner**

Mr. Edwards handles a wide range of commercial disputes before state and federal courts, including antitrust, contracts, copyright, ERISA, fraud, insurance coverage, product liability, securities, trade secrets, toxic tort, and wrongful death cases. Many of his cases involve allegations of fraud or self-dealing, such as securities fraud, investment fraud, or ERISA breach of fiduciary duty. Others involve highly technical industries, such as vehicle manufacturing or radio-communication systems. He has tried cases in Texas and Pennsylvania, and argued before the Fifth Circuit Court of Appeals. He recently recovered a record \$79 million on behalf of former Wells Fargo financial advisors whose deferred compensation was illegally forfeited in violation of ERISA. Mr. Edwards was a member of the legal team that recovered over \$173.8 million for investors in the Cobalt International Energy, Inc. securities class action litigation, and a member of the legal team that recovered \$22.5 million for investors in the Conn's, Inc. securities class action litigation. He has been honored for his pro bono efforts, including receiving the Harris County Bench-Bar Pro Bono Award, the Houston Volunteer Lawyers' Roadrunner Award, and Special Recognition for Exceptional Pro Bono Representation from the Houston Bar Foundation. Recognized by *Super Lawyers*, Mr. Edwards is a contributor to *Chambers and Partners Global Practice Guide*. Mr. Edwards is a Fellow of the Texas Bar Foundation and is rated AV-Preeminent by Martindale-Hubbell. He received his undergraduate degree from Princeton, and his law degree from the University of Virginia School of Law. He is licensed to practice law in Texas, and is admitted to the Northern, Southern, Eastern and Western Districts of Texas, and the Second, Fourth, and Fifth Circuits of the U.S. Court of Appeals.

**Courtney Scobie**  
**Partner**

Ms. Scobie's practice focuses on complex commercial litigation in state and federal courts and federal government investigations. Her experience includes winning a \$12.2 million judgment,

including full damages and all attorneys' fees, on behalf of a multinational computer technology company against its former employees and contractors who conspired to engage in a false-invoice and bid-rigging scheme to defraud the company. Ms. Scobie also won the dismissal of an antitrust complaint filed in New Jersey by Prime Healthcare, Inc. against our client who operates hospitals in New Jersey. Other experience includes a successful appeal of the denial of a special appearance in Texas state court on behalf of a Mexican banking group, a breach of fiduciary duty and legal malpractice case on behalf of a real estate investment trust, copyright infringement and trade secret misappropriation cases against a leading enterprise software company, a DOJ investigation involving antitrust allegations, an SEC investigation and a securities class action involving alleged accounting improprieties, several CFTC investigations involving the crude oil and natural gas liquids markets, contract and insurance disputes, product liability and toxic tort litigation, medical malpractice and personal injury litigation, and Fair Credit Reporting Act disputes. Recognized by *Super Lawyers*, Ms. Scobie has twice won the President's Award from the Houston Bar Association. She is a contributor to the acclaimed treatise, *BUSINESS AND COMMERCIAL LITIGATION IN FEDERAL COURTS*, as well as *Chambers and Partners Global and USA Practice Guides*. Ms. Scobie is a Phi Beta Kappa graduate of the University of Texas, and she earned her law degree from Georgetown University. She is licensed to practice law in Texas and is admitted to the Southern and Western Districts of Texas and the Eastern District of Michigan.

**Theodore Davis**  
**Of Counsel**

Theodore Davis began his securities law career over 20 years ago as staff counsel at Prudential Financial, analyzing investor complaints, negotiating settlements, and defending the firm in arbitrations around the country. In 2003, Mr. Davis switched hats and began representing investors in arbitrations before the NASD and FINRA. He attracted national acclaim after his landmark arbitration award against a clearing firm on behalf of a retired investor in Florida. After a week-long arbitration, Mr. Davis's client was awarded 100% of her losses, interest on those losses, her attorney's fees, as well as punitive damages of three times her actual losses. He then successfully defended the win before a federal judge in Tampa after the clearing firm sued to vacate the award. In addition, Theo is a licensed Solicitor in England and Wales, successfully representing overseas investors in numerous cases before FINRA. He negotiated a high-dollar settlement on behalf of a retired flight attendant from Norway (one of Pan Am's original 747 stewardesses) who had been defrauded of her life savings by an unscrupulous broker. Mr. Davis received his undergraduate degree from William & Mary, and his J.D. from New York Law School. In addition to England and Wales, he is licensed in New York and Connecticut, and is admitted to practice before the United States District Courts for the Southern and Eastern Districts of New York, the District of Connecticut, and the United States Supreme Court.

**Esteban Leccese**  
**Of Counsel**

Esteban Leccese is an experienced attorney admitted in civil-law and common-law jurisdictions, specialized in handling complex international litigation and arbitration, including commercial and investment claims under the rules of major international arbitration institutions such as the International Centre for Settlement of Investment Disputes (ICSID) and the International Chamber

of Commerce (ICC), and ad hoc arbitrations under the United Nations Commission on International Trade Law (UNCITRAL) Arbitration Rules. Mr. Leccese's relevant matters include high-profile cases involving a broad range of industries, such as the energy, oil and gas, mining, airlines, construction and infrastructure under different applicable laws. He also advises clients on strategic issues regarding dispute resolution clauses, protections provided for in bilateral investment treaties, and applicable procedures. Prior to joining Ajamie LLP, Mr. Leccese practiced law with two leading Argentine law firms in Buenos Aires and an international law firm in Houston and London. He received his J.D. from National University of Tucumán, Argentina, J.D., and his LL.M. from Columbia University. Mr. Leccese is licensed to practice in Texas and Buenos Aires, Argentina.

**Wallace A. Showman**  
**Of Counsel**

Wallace A. Showman has litigated dozens of successful class actions and derivative cases involving securities, corporate transactions, and consumer protection over the past twenty years, including *In re Gulf Oil/ Cities/Cities Service Tender Offer Litigation*, (S.D.N.Y.); *In re Marion Merrell Dow Inc. Securities Litigation*, *Sommerfield v. Tracinda* (D. Nev.), *In re U.S. Banknote Corp. Securities Litigation*, (S.D.N.Y.); *In re Amdahl Corp. Shareholders Litigation*, (Del. Ch.); *In re Northeast Utilities Securities Litigation*, *In re ICN/Viratek Securities Litigation*, (S.D.N.Y.); *In re PaineWebber Securities Litigation*, (S.D.N.Y.); *ITT v. Hilton Hotels Corp. et al.*, CV-S-97-0095-PMP(RLH) (D. Nev.); *In re Warner Lambert Derivative Litigation* (Del. Ch.), *In re Cendant Securities Litigation* (D. N.J.), and *In re Telxon Corp. Securities Litigation* (D. Ohio). Mr. Showman is a graduate of Queens College and received his law degree from New York University School of Law. He is licensed to practice in New York and is admitted to the United States District Courts for the Southern Eastern and Northern Districts of New York, and the District of Colorado.

**Dona Szak**  
**Of Counsel**

Dona Szak is an experienced commercial litigator who has handled claims such as breach of contract, securities fraud, money laundering and business torts relating to a broad range of industry sectors, including oil and gas, energy, financial services and sports. As legal counsel to the Houston Super Bowl LI Host Committee, Ms. Szak negotiated and prepared contracts, counseled on litigation matters, and advised the committee on other legal aspects of managing the multi-million-dollar week-long event. She regularly advises in connection with regulatory litigation, bankruptcy disputes and environmental litigation, and has steered numerous clients through the process of resolving difficult contract disputes without the need for litigation, thereby allowing the clients to preserve their business relationships. Recognized by *Super Lawyers*, Ms. Szak has also been honored as one of the nation's 500 Leading Lawyers by *Lawdragon*, and is rated AV-Preeminent by Martindale-Hubbell. Ms. Szak received her undergraduate degree from the University of Illinois and her J.D. *cum laude* from Washington & Lee University. She is licensed to practice law in Texas and is admitted to the Southern and Eastern Districts of Texas.

**Thomas Valentino**  
**Of Counsel**

Thomas Valentino is a prominent entertainment attorney experienced in transactional law, contract negotiations, litigation settlements, asset monetization and intellectual property licensing. Mr. Valentino's practice specializes in counseling across all legal, business, and financial platforms of the entertainment industry, with targeted defense of intellectual property rights. He provides strategic and legal advice to recording artists, industry executives, music publishers, songwriters, producers, managers, and media tech companies. Mr. Valentino has represented clients in negotiations with Universal Music Group, Sony Music Entertainment, Warner Music Group, BMG, Hipgnosis, Reservoir Media, Viacom, and HBO among others. His client roster includes Oscar and Grammy Award winners, Rock 'n Roll and Songwriter Hall of Fame inductees. Mr. Valentino has appeared on and quoted in numerous media outlets including SiriusXM, Good Morning America, CNBC, *The Observer*, various Conde Nast publications, and *People*. He is a Board Member of the Austin, Texas Musicians Treatment Foundation and served for six years as a Board Member of the T.J. Martell Foundation for Cancer Research where he was a top fundraiser; he has also advised the UJA-Federation of New York, where he created the Music Visionary of the Year Award and was on the Advisory Board of New York's PBS Networks. He was a presenting Committee Member at the Paley Center for Media, a Community Advisory Board Member for WNET/WLIW and the pro-bono General Counsel for Media Rights, an early advocate for short form documentaries that promote social change and inclusion. A graduate of New York University, Mr. Valentino attended Hofstra University School of Law and clerked under the New York State Court of Appeals for admission to the New York State Bar.